

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

24 MAY -9 PM 2:41  
U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
FBI - CINCINNATI

UNITED STATES OF AMERICA,

Plaintiff,

v.

DESMOND LAMAR BROWN, JR.,

Defendant.

CASE NO. 24cr00079

JUDGE Morrison

INDICTMENT

18 U.S.C. § 922(a)(6)

18 U.S.C. § 924(a)(2)

**THE GRAND JURY CHARGES:**

COUNT 1  
(False Statement During Purchase of a Firearm)

On or about June 30, 2022, in the Southern District of Ohio, the defendant, **DESMOND LAMAR BROWN, JR.**, in connection with the acquisition of a firearm, specifically, a Glock 19, 9mm pistol bearing serial number BTBZ911, from Vance Outdoors, 3723 Cleveland Avenue, Columbus, Ohio, a federally licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to Vance Outdoors, which statement was intended and likely to deceive Vance Outdoors as to a fact material to the lawfulness of such sale of said firearm to the defendant under Chapter 44 of Title 18, in that the defendant executed a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, and represented that he was

the actual transferee/buyer of the firearm, when in fact the defendant was acquiring the firearm on behalf of another person.

**In violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2).**

**A TRUE BILL.**

*S / Foreperson*

**FOREPERSON**

**KENNETH L. PARKER**  
United States Attorney

*[Signature]*  
**KEVIN W. KELLEY (0042406)**  
Assistant U.S. Attorney